

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA §
 §
 §
v. § No. 4:22CR191
 § Judge Jordan
RICHARD WAYNE SMITH §

**GOVERNMENT'S MOTION FOR LEAVE TO FILE
MOTIONS FOR LIMITED UNSEALING AND A PROTECTIVE
ORDER UNDER SEAL**

The United States, by and through the undersigned Assistant United States Attorney, respectfully requests leave to file under seal the government's Motions for Limited Unsealing and a Protective Order as certain discovery materials and the search warrants contain sensitive, identifying information about child victims and child witnesses, as defined by 18 U.S.C. § 3509(a)(3). The discovery will also contain information about sensitive law enforcement techniques. Accordingly, the undersigned seeks permission to file the Motions under seal.

CONCLUSION

Based on the foregoing, counsel for the United States requests that this Court grant the government's Motion for Leave to File its Motions for Limited Unsealing and a Protective Order for under seal.

Respectfully submitted,

BRIT FEATHERSTON
UNITED STATES ATTORNEY

/s/

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CERTIFICATE OF CONFERENCE

I certify that I conferred with Brian O'Shea, Esq., counsel for defendant Richard Wayne Smith, and the defense agrees to this motion.

/s/

Marisa J. Miller

CERTIFICATE OF SERVICE

I certify a true and correct copy of the Motion for Leave to File Motions for Limited Unsealing and a Protective Order under seal was served by electronic filing to counsel of record on this 11th day of August, 2022.

/s/

Marisa J. Miller